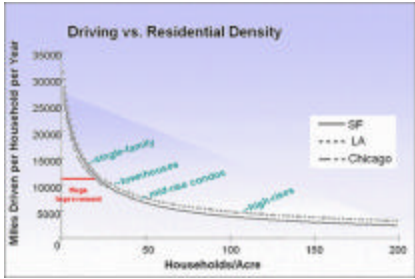


## Response to Comments Table Air Quality Chapter (July 28, 2009)

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General	Farm Bureau	There needs to be a policy and implementation strategy that supports control burns as a means of preventing highly polluting wildfires.	Controlled burns are addressed in the Safety Element of the General Plan.
General	NCAC Community	Misunderstanding of controlled burns as a preventative measure.	Noted. See above.
General	NCAC Community	Need policies regarding threats to air quality from off-road vehicles, lawnmowers, blowers, water boats, tractors, wildfires, and controlled burns.	These are subject to specific air quality regulations that will be determined by APCD.
General	NCAC	Strategies regarding clean air should include wood burning.	Wood burning appliances are already regulated by the US EPA.
General	HBA	<p>VTM should be removed as a measurement standard in favor of reducing GHG emissions.</p> <ul style="list-style-type: none"> <li>▪ Compare the per capita VMT with equivalent counties.</li> <li>▪ Compare VMT by residents, tourists, and travelers passing through.</li> <li>▪ Need to determine if VMT is a GHG problem and if it can be controlled.</li> </ul>	<p>GHG emissions are addressed in the policies and IS's under Goal 4:</p> <p><i>"Greenhouse gas emissions from County operations and communitywide sources will be reduced from baseline levels by a minimum of 15% by 2020".</i></p> <p>The Climate Action Plan will address comparative counties, pass-through traffic and other specific GHG issues in compliance with adopted protocols.</p>
General	HBA	Regulation of new development cannot fix an existing VMT problem. Focus must be on transportation management.	Agreed - See Policies 1.3 through 1.8.
1.10 Intro	B.K. Richards	Adapting to climate change seems vague, and it is not clear that this should be in the domain of Air Quality. Sea level rise and weather extremes are more likely to affect Water Resources and Public Works.	Other jurisdictions use the language, "preparing for climate change." Adapting to climate change is specific enough for a goal statement. The Air Quality chapter was determined to be the best location for the issue of climate change. Climate change is also addressed in the Water Resources chapter (see Policy WR 5.2 on page 10.23)
1.13 Intro	B.K. Richards	Page 1.13. Air Quality Issues. As with many of the issues statements, this seems more of a general discussion than a focused piece on the issues. What are the barriers to solving the problems? We have a PM10 problem, we have an ozone problem, and we are required to do our share with respect to climate change and GHGs. Isn't the problem with ozone that it's outside the county?	The Issues section progresses through the categories of issues such as effect of historical land use decisions, the need to show leadership in the field, proper application of existing law; effects of future development, and the need for a regional approach.
2.3	NCAC	Revise measurement or standard for particulate pollution.	The PM 10 standard has not yet been changed to 2.5.

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2.3	HBA	Provide evidence that air pollution from motor vehicles and inefficient land use patterns are major sources of air pollution.	See Appendix 2 and APCD Clean Air Plan for background on air quality issues.
2.3 Climate Change	Farm Bureau	Climate Change, Sentence 2: This paragraph and sentence must clearly state that although the Intergovernmental Panel on Climate Change assessment speaks to a worldwide categorization of the top three sources of pollution, it does not represent major contributors of GHG emissions in San Luis Obispo County.	Specific SLO County statistics are cited on page 2.5.
2.6 Major Issues	B.K. Richards	This is a description of why VMT has gone up. To be an "issue" this could state why getting VMT down is important and why it will be hard to do so.	The major issues paragraph states the air quality problems that need to be solved, explains why the problems have occurred and what has to happen to reverse the trend.
2.7 Sidebar	B.K. Richards	This is a terrific summary of Goals. It is a definition of "success" in a major area	Noted. The "We Will Recognize Success When" sidebars appear in all chapters near the table of goals.
2.7 Major Issues (2) (3)	B.K. Richards	Major issues (2) and (3) are not expressed as issues.	The issues described in these paragraphs include 1) opportunities for the County to show a leadership role in air quality issues; 2) Application of CEQA to minimize adverse air quality impacts.
2.7 Major Issues (4)	B.K. Richards	Separate Major issue (4) into one issue on ozone and one on PM 10.	Both ozone and PM10 are criteria pollutants and should be mentioned in the same paragraph.
2.7 Major Issues	B.K. Richards	Conduct additional research regarding the transport of ozone from other counties.	Transport of pollutants into the County is a focus of the APCD's Clean Air Plan. The COSE will defer to that specific implementation document to address the complex issue of pollutant transport.
2.8 Table AQ-1	B.K. Richards	AQ1 should include VMT reduction amounts and timing. AQ 2 should explain the importance of being a leader. AQ 3 could be stated in terms of removing current deficiencies. Should county operations be included in AQ4? Would the County resist adapting to climate change (AQ5?)	1. The upcoming Climate Action Plan (CAP) will set VMT reduction targets. 2. Last sentence of Issue #2 states "...provide a model and supporting infrastructure for the private sector". 3. Meeting standards will correct any deficiencies (which can vary over time). 4. GHG emissions inventories include county operations and communitywide sources. It is logical to address both sources together. 5. Resistance to adapting to climate change is not the issue; complacency is.
2.9 Policy 1.1	B.K. Richards	The County should document major transportation corridors, promote multi-story commercial centers and smart growth zones.	The IS's for AQ 1.1 and 1.2 will help facilitate compact, multi-family and commercial development near transportation and services.
2.9 IS 1.1.1	LOCAC	Amending ordinances will take time, but principles in the General Plan will be helpful to guide development and decisions by the Planning Commission and the Board. The goal of reserving natural resources	IS 1.1.1 (a-g) addresses commercial and residential development locations and pedestrian circulation, and can act as a guide for decision makers.  A Vegetation Mapping Program for the

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		(COSE policy) means identifying our trees throughout our community and preparing a Master Plan for preserving significant and native trees.	unincorporated county is now underway. See BR 1.10.2
2.9 IS 1.1.1 (e)	HBA	Banks and investors are unwilling to fund projects that mix food service on the first floor with residential above.	Comment noted. The IS “promotes” mixed-use development.
2.10 IS 1.1.1 (g)	HBA	The ½-mile standard is unachievable.	The COSE is a policy document; it does not establish “standards” unless the word is specifically used. In this case the full text of the IS is: <i>g. Encourage new residential development to be within walking distance (1/2 mile or less) to public activity centers such as schools, libraries, parks, and community centers. (E2)</i> The primary way to implement this measure is through community plan updates and general plan amendments.
2.10	LOCAC	Los Osos should work towards having:  - its own “Jitney” service for around town - two small vanpool vehicles - several park and ride lots conveniently located.	See IS 1.2.1 a-g
2.10 IS 1.2.1	B.K. Richards	Is there enough RMF-zoned land? Should there be a goal to increase the amount?	The Housing Element calls for increasing the supply of RMF-zoned land. The COSE supports this in IS 1.2.1(g).
2.10 IS 1.2.1	NCAC	Increased density does not decrease VMT.	According to research by the Center for Neighborhood Technology, there is a direct relationship between VMT and residential density.  
2.10 IS 1.2.1	HBA	Strategy regarding densities along transit corridors needs to state “county land use policy will set minimum densities along transit corridors.”	IS’s 1.2.1 f and g address this issue.
2.11 IS 1.2.1 (f)(g)	HBA	County needs to identify and rezone areas in regard to establishing minimum densities on appropriate sites.	Rezoning land is outside the scope of the COSE. The Land Use and Housing Element address this issue.

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2.11 Policy 1.3	NCAC	Policy AQ 1.3 has no plan for implementation.	It is implemented by AQ 1.3.1, which is implemented through review of new development.
2.11 IS 1.3.1	HBA	Consider project size, location, and fiscal feasibility in regard to smart growth.	These considerations are typically a part of project-level review.
2.11 IS 1.3.1	LOCAC	Complete an in-depth study of our streets, the lack of connections, where the Fire Department would like better connections and where pedestrian paths could be installed that lead to the commercial zone along Los Osos Valley Road.	Circulation plans are outside the scope of the COSE. Community plans will address these specific issues.
2.11 Policy 1.4	APCD	Add an implementation strategy regarding alternative transportation.	An IS for AQ 1.4 is not necessary; this policy also functions as an implementation strategy – it is self-implementing.
2.11 Policy 1.4	HBA	This is fiscally infeasible with regard to alternative transit improvements and new construction.	New development is required to pay its fair share for infrastructure improvements.” Per the Framework For Planning, Revise the policy to state: “...should be in place or funded concurrent with the need”. <del>Otherwise guaranteed, before or concurrent with construction of the new development.</del>
2.11 Policy AQ 1.5	LOCAC	Los Osos needs to create jobs here to reduce commuting, provide commuter lots and encourage ride sharing, and work towards having a “Jitney” service here. How about a Light Rail from here to SLO?	See Policy AQ 1.1 Mass or rail transit is generally not feasible in lower density areas like ours.
2.12 IS AQ 1.5.3	Farm Bureau	A transportation tax or sales tax is not a solution to reducing VMT. It only impacts those who must use trucks and other vehicles in order to conduct their businesses, such as agriculturalists.	The IS states that a feasibility analysis is to be done. These issues would be considered in a feasibility analysis.
2.12 Policy AQ 1.6	LOCAC	Work with Cal Fire to identify the unimproved streets that need to connect through the community. An implementation strategy needs to be developed for Los Osos, possibly in conjunction with the sewer project.	Noted. IS 1.6.3 calls for a “Complete Streets” ordinance to be adopted by 2014. Such an ordinance would address unimproved and dead end streets.
2.13 IS 1.6.3	NCAC	What street type would accomplish the complete streets ordinance?	A street that considers all users.
2.14 Policy 1.7	NCAC	Priority time frames are inconsistent.	Although the IS cited is a low priority, its implementation is still in 2010.
2.14 IS 1.7.2	Farm Bureau	This Implementation Strategy for Rails-to-trails has a serious problem. It must be clearly stated that no “abandoned rail rights-of-way” which cross or utilize private land will be part of this proposal.	The IS calls for a study of the use of abandoned rights of way. Private property issues will be included in the analysis.

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2.14 Policy 1.8	APCD	Add an implementation strategy regarding alternative transportation programs.	Policy AQ 1.8 also functions as an implementation strategy – it is self-implementing. Specific measures, such as those recommended by APCD, will be quantified and recommended in the Climate Action Plan.
2.14 Policy 1.9	APCD	Add an implementation strategy regarding use of railways.	Policy AQ 1.9 also functions as an implementation strategy – it is self-implementing.
2.16 Policy 2.4	APCD	Add an implementation strategy regarding alternative fuels for waste collection vehicles.	An IS for Policy AQ 2.4 is not necessary, as the policy is self-implementing. The Climate Action Plan could attempt to pinpoint the GHG emissions from waste haulers and quantify the reductions that could occur if haulers were conditioned to use alternative fuels. This would need to be reviewed by the Public Works Department.
2.16 Policy 2.5	APCD	Add an implementation strategy regarding the use of clean fuels and requiring a certain percentage of new vehicles purchased to be more energy efficient.	Policy AQ 2.5 is self-implementing. It may be more appropriate to address this in the Climate Action Plan. With that effort, the percentage reduction could be refined based on a quantitative method.
2.16 Policy 2.6	APCD	Add an implementation strategy regarding alternative fuel incentives.	Policy AQ 2.6 is self-implementing and no additional implementation is needed.
2.17 Goal 3	B.K. Richards	Change Goal AQ 3 to reach PM10 compliance by a certain time. Also note ozone transport information.	Time frames would not be productive, because: 1) the primary responsibility lies with APCD, 2) it is difficult to establish an accurate date, and 3) standards change, so we would be constantly chasing the goal.
2.18 Policy 3.4	APCD	Add an implementation strategy regarding public exposure to toxic air contaminants. Recommend working with the APCD to implement region's Toxic Risk Management Plan.	Agree. <b>Add</b> IS 3.4.1, " <u>Toxic Risk Management Plan</u> : <u>Work with APCD and other stakeholders to implement the region's Toxic Risk Management Plan.</u> "
2.18 Policy 3.7	APCD	Add an implementation strategy regarding heavy-duty vehicle idling. Recommend implementing all APCD and ARB idling reduction policies for school and other sensitive receptors.	Agree. <b>Add</b> IS 3.7.1: " <u>Encourage the reduction of heavy duty vehicle idling through out the county using APCD and California Air Resources Board idling reduction policies for schools and other sensitive receptors.</u> "
2.18 Policy 3.7	NCAC	Policy AQ 3.7 has no implementation strategy.	See response to comment above.
2.18 Policy 3.7	NCAC	Revise wording and consider an IS.	See response to APCD comment above.
2.19 Goal 4	Sierra Club	Revise: Greenhouse gas emissions from <u>all sources within the County operations and emissions sources</u> will be reduced <u>at least to net zero as soon as possible but by no later than mid-century (2050).</u>	GHG protocols divide emissions into community and county operations and such language should be used consistently. Use of "net zero as soon as possible" makes it more reaching the goal more difficult or uncertain .

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2.19 Policy 4.2	NCAC	Policy AQ 4.2 should be raised to a high and immediate priority.	<b>Revise</b> the priority of IS 4.2.5, <i>Prepare and Update Climate Action Plan</i> , from “Medium” to “High” Preparations are already underway to start work on a Climate Action Plan, the key strategy for this policy. The plan could be completed as early as 2010.
2.19 IS 3.8.1	Public Works	Revise (3) regarding road surfaces and dust.	<b>Revise:</b> “(3) <del>Post reduced speed limits, and/or</del> <del>P</del> pave or “chip seal” County-maintained dirt roads to minimize fugitive dust.”
2.20 IS 4.2.4	B.K. Richards	IS 4.2.4 and Goal AQ 4 are redundant and suggests more information is needed for the Climate Action Plan.	The IS describes how the GHG target is to be set.
2.21 Policy 4.4 and IS 4.4.3	Farm Bureau	Strike agriculture from this policy and the IS. As Ms. Auchinachie stated in her February 27, 2009 letter to James Caruso, “agricultural activities are not considered development projects,” and if GHG emissions from agriculture are to be considered, the appropriate place is in an amendment to the Agriculture Element, not the COSE.	Partially agreed. <b>Combine</b> IS 4.4.3 with IS 4.2.5. GHG emissions from agricultural activities will be considered in the Climate Action Plan. Only <i>discretionary</i> agricultural activities such as development projects will be subject to GHG analysis and reductions.
2.22 IS 4.4.3	APCD	Change wording regarding agricultural activities and development projects to more general language	IS AQ 4.4.3 should not be changed as agricultural activities is one of the categories of GHG emissions
2.22 IS 4.4.3	Agriculture Department.	Delete “agricultural activities” from GHG reduction measures.	No changes recommended. Agricultural activities are included in “land uses.” All sectors (e.g., transportation, agriculture) should help reduce their share of GHG emissions.
2.23 IS 4.5.1	Farm Bureau	We support carbon sequestering. Sequestration on agricultural land is happening today whether recognized or not, but any policy and implementation relating to sequestration on agricultural land must be placed in the Agriculture Element, not the COSE.	No change recommended. All GHG policies will be in the COSE. If, in the future, the Agriculture Element is amended, GHG issues may also be included at that time.
2.23 Goal 5	B.K. Richards	Goal 5 should include margins of safety.	IS 5.1.2 could consider this approach to climate change adaptation.
2.23 AQ Policy 5.1	LOCAC	Is it time to discuss where a seawall would be needed and who will pay for it? Seawalls are very expensive.	Adapting to climate change requires an effort far broader than seawalls or even sea level rise.

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2.24 IS 5.1.2	Farm Bureau	Climate Change Adaptation, b: Land acquisition must be stricken from the IS. Government ownership of more private land is not appropriate, and in this era of lack of funds it is even foolhardy.	Disagree. Lands that are under threat from sea level rise or other affects of climate change should be addressed using a variety of options.
2.25 Table AQ-2	Public Works	Add GSA (Parks and Recreation) as a responsible agency to IS 1.3.1.	Noted. <b>General Services Agency will be added to Table AQ-2 at IS 1.3.1</b>
2.26 Table AQ-2	Public Works	Add PW as responsible agency to AQ 1.5.4.	Noted. <b>Dept of Public Works will be added to Table AQ-2 at IS 1.5.4.</b>
2.26 Table AQ-2	NCAC	AQ 1.7.3 referenced, but not in document.	AQ 1.7.3 is not found in the document or the table.
2.26 Table AQ-2	NCAC	AQ 1.7 low priority vs. AQ 2.2 high priority.	The timing and priorities of IS's need to be looked at as a whole. While some IS's may have a low priority, others have a high or immediate priority.
2.26 Table AQ-2	NCAC	AQ 2.2.4: revise priority.	IS 2.2.4 is not found in the document.
2.27 Table AQ-2	NCAC	Revise priority of AQ 4.2.5 to high.	<u>Revise</u> the priority from "Medium" to "High"
2.27 Table AQ-2	NCAC	AQ 4.2.7 referenced in table but not in document.	IS 4.2.7 is not found.
2.27 Table AQ-2	NCAC	AQ 4.4.4 and AQ 2.3.1 priorities: consider revising due to similarity.	There is overlap among the two strategies as they both address aspects of County operations; however, IS 4.4.4 is broader than IS 2.3.1. IS 2.3.1 can be implemented faster as it entails development of a fuels strategy and 4.4.4 requires actions be taken.
2.27 Table AQ-2	Agriculture Department	Remove the Agriculture Department as a responsible department for IS 4.4.3.	The Agriculture Department should have a role in implementing this strategy involving agricultural activities.
2.26-2.27 Table AQ-2	NCAC	Review the priority time frames for implementation. Examples: AQ 1.7, AQ 4.4.4, and AQ 4.2.6.	Different issues are addressed in these IS's.
Appendix A-2.4 Figure A2-1	B.K. Richards	Annotate Figure A2-1 with regular levels and only address PM10 levels. Incorrect reference to figure in document.	<b>Revise</b> figure reference in Appendix 2